

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

THE SOUTH CAROLINA STATE  
CONFERENCE OF THE NAACP, *et al.*,

*Plaintiffs,*

v.

THOMAS C. ALEXANDER, *et al.*,

*Defendants.*

Case No. 3:21-cv-03302-MGL-TJH-RMG

**THREE-JUDGE PANEL**

**PLAINTIFFS' CONSENT MOTION AND MEMORANDUM  
TO FILE REDACTED COPY OF AND SEAL CERTAIN EXHIBITS TO PLAINTIFFS'  
OPPOSITION TO SENATE AND HOUSE DEFENDANTS' JOINT MOTION FOR  
SUMMARY JUDGMENT**

Pursuant to the Court's September 6, 2022 Order (ECF No. 360), the Court's Confidentiality Order (ECF No. 123), and Local Civil Rule 5.03, Plaintiffs' hereby move to seal certain exhibits to their Opposition to Senate and House Defendants' Joint Motion for Summary Judgment ("Opposition"), and to file the Opposition with redactions to protect the confidentiality of those exhibits and other information over which there is an assertion of confidentiality. Plaintiffs' counsel certifies that this motion complies with Local Civil Rule 5.03. Pursuant to Local Civil Rule 7.02, Senate and House Defendants consent to this motion.

The Opposition itself is being filed in redacted form in compliance with this Court's Order at ECF No. 360. The subset of exhibits are being filed under seal according to the standards for sealing in Local Civil Rule 5.03, and the Fourth Circuit's guidance in *Ashcraft v. Conoco, Inc.*, 218 F.3d 288, 302 (4th Cir. 2000), and *In re Knight Pub Co.*, 743 F.2d 231, 235 (4th Cir. 1984). Namely: (1) public notice of the request to seal and opportunity to object is afforded by virtue of this publicly filed motion and the non-confidential, description index attached as Exhibit A hereto, *see* Local Civil Rule 5.03(B); (2) confidential material, as designated by House Defendants, appears throughout the exhibits, and, therefore, redaction is not practical; and (3) good cause exists to seal the requested documents. House Defendants continue to maintain confidentiality over those documents and, pursuant to the Court's Confidentiality Order (ECF No. 123), Plaintiffs are honoring that designation.

Plaintiffs respectfully request that this Court accept the filing of the redacted version of their Opposition and seal the exhibits described in Attachment A.

Dated: September 9, 2022

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\* Motion for admission *Pro Hac Vice*  
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\*\* Admitted *Pro Hac Vice*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on September 9, 2022, a true and correct copy of the foregoing was served on all counsel of record by electronic mail.

*/s/ Santino Coleman*  
Santino Coleman